

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

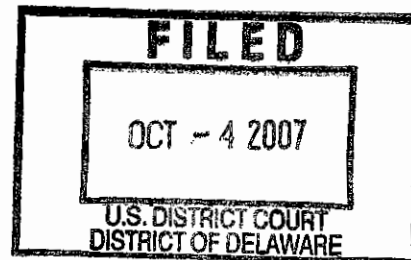
Cathy D. Brooks-McCollum  
& On behalf of  
Emerald Ridge Service Corporation Derivative Action  
As a Director  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241  
mccollumc1@comcast.net  
**(PLAINTIFF)**

**CIVIL ACTION NO: 04-419 (JJF)**

**JURY TRIAL REQUESTED**

vs.

State Farm Insurance Company  
**(DEFENDANTS)**



**PLAINTIFF'S DISCOVERY ISSUES DUE TO COURT**

*BD scanned*

1. Plaintiff requested that Defendants supply them with all copies of the Emerald Ridge Insurance Company. These documents go directly toward the support of Defendants Tortfeasor actions.
2. Plaintiff requested that certain members of the State Farm Staff be deposed, of which has not been complied with.
3. Plaintiff requested that Defendants supply them with a copy of the Deposition taken at their request, accessing those costs against the Corporations policy, of which Plaintiff Cathy Brooks-McCollum directly paid into until 2005, which does not matter when requiring that all Policies be supplied up until the period of 2007. These defendants have failed to comply.
4. Plaintiff requested that Defendants make certain Admissions (Supplied to The Courts), and if there were any that they felt they could not answer to state the reason, why. Defendants failed to comply with all Admissions outlined. Whereby Plaintiffs ask that the court indicate what Admissions Defendants must answer.
5. Plaintiff requested that other parties who were Joint Tortfeasors along with these defendants answer certain Interrogatories (Supplied to The Court), which have not been complied with to date. Plaintiff specifically asked that these items be answered, as not to allow those parties to at any point argue ineffective counsel, for not being fully formed. Plaintiff also asked that Defendants answer these Interrogatories, knowing

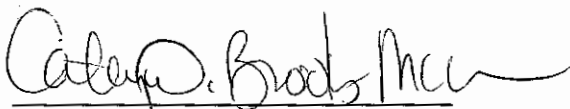
Defendants prior practices of placing individuals and Corporations in a financial disarray, and not meeting the terms of their Insurance policies, only to abandon those parties after they themselves contributed mostly to the reckless actions. Plaintiff would ask the court to order that the Interrogatories be answered, and which ones, and that each Defendant have them notarized personally, as not to allow any counsel to answer for them, especially when some of the questions relate to ineffective counsel.

6. Plaintiff requested from Defendants Depositions, Insurance Policies, and all documents relating to Emerald Ridge Service Corporation, which are Corporate property, of which have not complied with, wherefore Plaintiff ask that the court order through Subpoena that the documents be produced. These items are available through the Insurance Policy payments.

7. Plaintiff requested that the corporations banking records be produced for inspection in that it has been determined that Plaintiff Cathy Brooks-McCollum was a stockholder, as well as a Director, and presented a Subpoena as to have those items turned over. Plaintiff further asks that the court order that all items be produced.

Plaintiff respectfully, ask that the court allow plaintiff to address these issues in their Reply Brief on Defendants being Joint Tortfeasors after their Opening Brief supporting Defendants Tortfeasor actions, and supply to the Court the discoverable items. Plaintiff has indicated in Exhibits AK through AQ items which will be supplied to the Court, upon those items being presented to Plaintiff, as well as other items, which have to be re-produced.

Respectfully submitted,



/s/ Cathy D. Brooks-McCollum  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241  
October 2, 2007

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Cathy D. Brooks-McCollum  
& On behalf of  
Emerald Ridge Service Corporation Derivative Action  
As a Director  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241  
mccollumc1@comcast.net  
**(PLAINTIFF)**

**CIVIL ACTION NO: 04-419 (JJF)**

**JURY TRIAL REQUESTED**

vs.

State Farm Insurance Company  
**(DEFENDANTS)**

**PROOF OF SERVICE**

I Cathy D. Brooks-McCollum hereby certify that on the 5<sup>th</sup> day of October 2007, I will and have caused to be served a true and correct copy of the foregoing Brief electronically upon defendants:

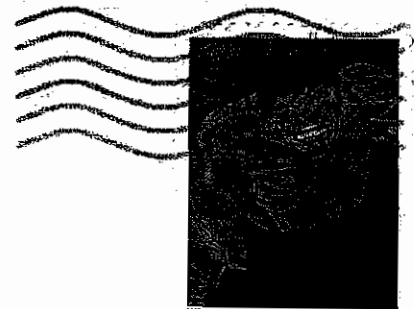
Casarino, Christman & Shalk  
Stephen P. Casarino  
800 North King St, Suite 200  
P.O. Box 1276  
Wilmington, DE 19899  
(302) 594-4500  
(302) 594-4509 Fax



/s/ Cathy D. Brooks-McCollum (Pro Se)  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241

WILMINGTON DE 197

03 OCT 2007 PM 1 T



United States District Court  
For The District of Delaware  
Beggs Building  
844 N. King Street  
Lock Box 18

U.S.  
X-RAY

19801+3519 0012 10/04/2007 09:00